



January 9, 2015

United States Environmental Protection Agency - Region 2
DECA - PTSB - Toxic Substances (MS-105)
2890 Woodbridge Avenue (MS-105)
Edison, New Jersey 08837

Attn.: Henry Mazzucca, P.E., Chief

**Re: 15th Quarterly Status Report
PCB Remedial Action
Arsynco, Inc. Site
Carlstadt, New Jersey**

Dear Mr. Mazzucca:

In accordance with Section 5 of the USEPA's *Approval for Risk-Based Clean-up/Disposal of Polychlorinated Biphenyl Remediation Waste* for the Arsynco site, which became effective on July 21, 2009 (the "EPA Approval"), the following provides the 15th Quarterly Status Report for the PCB remedial action at the Arsynco facility.

The following activities/actions have occurred in relation to the site since the last Status Report was submitted to EPA on October 9, 2014:

- Following a pre-application meeting with NJDEP, and at NJDEP's request based on the scope of work required for the remediation of the site, Arsynco prepared and submitted a Multiple Permit Application (MPA) to NJDEP for the required permits to conduct the PCB remediation. The MPA included a Freshwater Wetlands General Permit #4 (GP4), a Coastal General Permit #15, a Waterfront Development Permit (in-water), a Waterfront Development Permit (upland), an Individual Flood Hazard Area Permit, and a NJDEP Section 401 Water Quality Certificate. Subsequent to the submittal of the MPA, NJDEP determined that Arsynco did not need the Freshwater Wetlands General Permit #4, the Coastal General Permit #15, and the Waterfront Development Permit IP (upland). Therefore, on December 1, 2014 Arsynco officially withdrew these specific permit applications. NJDEP has completed an initial review of the remaining, applicable MPA parts and has requested some additional information from Arsynco. Arsynco is currently preparing the additional permit application information requested by NJDEP.
- Arsynco has completed the majority of the application for a Nationwide Permit 38 (NWP-38) for submittal to the United States Army Corps of Engineers (USACOE). The NWP-38 application will be submitted in the near future.
- Arsynco has determined the proposed location of the "Consolidated Material TSCA Disposal Area" which must be submitted to EPA in accordance with the Section 3.D) of the Approval. The proposed location of the "Consolidated Material TSCA Disposal Area" is currently being reviewed

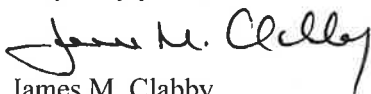
by NJDEP as part of the MPA permit package and is expected to be submitted to EPA once NJDEP completes a sufficient review and verifies that no permitting issues will impact the proposed location.

- Arsynco obtained the required operational permits from NJDEP and completed the installation of the NJDEP-approved in-situ air sparge and soil vapor extraction (AS/SVE) treatment system on the site. Testing and initial startup activities for the system were conducted from November into December 2014, and operation of the system commenced on December 15, 2014.
- As noted in the last Status Report, Arsynco received a letter from EPA that provided EPA's comments on the financial assurance documents previously submitted by Arsynco. On January 6, 2012, Arsynco submitted an e-mail reply to EPA's letter. The e-mail response was submitted to Ms. Vickie Pane, of EPA, and requested clarification and specificity on EPA's comments to ensure that Arsynco's responses would fully satisfy EPA's requirements. On January 10, 2012, Arsynco submitted a second e-mail to Ms. Pane that provided a signed version of the letter of credit, which addressed one of the comments contained in EPA's October 2011 letter, and again requested a response from EPA clarifying the inquiries stated in the January 6, 2012 e-mail. As of the date of this letter, no response has been received from EPA on these issues.

The approval of the remaining financial surety issues is critical to allow the PCB remediation program at this site to move forward. Therefore, Arsynco respectfully requests EPA's timely review and response to the remaining financial surety questions.

Should you have any questions or require additional information regarding this matter, please feel free to contact me at (732) 295-2144.

Very truly yours,



James M. Clabby
President

cc: James Haklar, USEPA
Jay Nickerson, NJDEP